



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 21 2014

Andrew Hall
Division of Air Pollution Control
Ohio Environmental Protection Agency
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

REPLY TO THE ATTENTION OF:

Dear Mr. Hall:

The U.S. Environmental Protection Agency has reviewed the draft synthetic minor construction permit, permit number P011557, for Lima Energy Co. in Lima, Ohio. This permit contains synthetic minor restrictions/limits for greenhouse gases, sulfur dioxide, and hazardous air pollutants (methanol). The proposed permit would allow construction of a gasification plant that will convert petroleum coke, coal, and biomass into a low-sulfur synthetic crude. The facility is proposed to be located adjacent to the existing Lima Refinery. To ensure that the source meets Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comments:

Emissions unit F004 - Raw Material Handling and Storage is subject to 40 CFR Part 60.254 NSPS Subpart Y: Standards for Coal Preparation Plants, and 40 CFR Part 60.254(b)(2) requires that there be no particular matter discharged from any mechanical vent in excess of 0.023 g/dscm (0.010 gr/dscf). This emission limit would be for "any coal processing and conveying equipment, coal storage system, or coal transfer and loading system processing coal." Please add this emission limit to the permit.

To assure compliance with the 0.001 gr/dscf PM₁₀ emission limit for emission units P010, P011, P012, and P013, the baghouse should be equipped with a bag leak detector to help detect any bag leaks, tears, or holes.

We appreciate the opportunity to provide comments on this draft permit. If you have any questions, please feel free to contact me or have your staff contact Rich Angelbeck, of my staff, at (312) 886-9698.

Sincerely,

For
Genevieve Damico
Chief
Air Permits Section